

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
AT LAW AND IN ADMIRALTY

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

CERTAIN REAL PROPERTY  
commonly known as  
4512 SOUTH DREXEL BOULEVARD,  
CHICAGO, ILLINOIS,

Defendant.

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**VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM**

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The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for this district, alleges as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), which provide for the forfeiture of property that constitutes or is derived from proceeds traceable to specified unlawful activity, namely, wire fraud, committed in violation of Title 18, United States Code, Section 1343.
2. This Court has jurisdiction over this matter under 28 U.S.C. §§ 1345 and 1355.
3. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district.

4. The defendant is a parcel of real property located 4512 South Drexel Boulevard, Chicago, Illinois, with all improvements, appurtenances, and attachments thereon, being further described as follows:

The South 36 ½ feet of the North 41 ½ feet of Lot 3 in Haines, Sidway and Layton's Resubdivision of Block 6 in Walker and Stinson's Subdivision of the West ½ of the Southwest ¼ of Section 2, Township 38 North, Range 14 East of the Third Principal Meridian, in Cook County, Illinois.

Parcel ID Number: 20-02-311-013-0000

5. Since May 26, 2017, the defendant real property located at 4512 South Drexel Boulevard, Chicago, Illinois, has been titled to World Burns, Inc.

6. The facts and circumstances supporting the forfeiture of the defendant real property are contained in the affidavit of Park Jones, which is attached hereto as Exhibit A and is fully incorporated herein by reference.

7. The defendant real property commonly known as 4512 South Drexel Boulevard, Chicago, Illinois, with all improvements, appurtenances, and attachments thereon, is property that was purchased with proceeds constituting or traceable to proceeds of a wire fraud scheme committed in violation of 18 U.S.C. § 1343, and is therefore subject to civil forfeiture under 18 U.S.C. § 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1).

WHEREFORE, the United States of America prays that notice of the complaint for civil forfeiture *in rem* be posted upon the defendant real property located at 4512 South Drexel Boulevard, Chicago, Illinois, in an open and visible manner in order to make the government's action open and notorious; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant real property to be condemned and forfeited to the United States of America for disposition according to law;

and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 21<sup>st</sup> day of August, 2018.

Respectfully submitted,

MATTHEW D. KRUEGER  
United States Attorney

By:

s/SCOTT J. CAMPBELL  
SCOTT J. CAMPBELL  
Assistant United States Attorney  
Scott J. Campbell Bar Number: 1017721  
Attorney for Plaintiff  
Office of the United States Attorney  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 530  
Milwaukee, Wisconsin 53202  
Telephone: (414) 297-1700  
Fax: (414) 297-1738  
E-Mail: [scott.campbell@usdoj.gov](mailto:scott.campbell@usdoj.gov)

*Exhibit A*

**AFFIDAVIT IN SUPPORT OF A VERIFIED COMPLAINT FOR CIVIL  
FORFEITURE *IN REM* OF CERTAIN REAL PROPERTY COMMONLY KNOWN AS  
4512 SOUTH DREXEL BOULEVARD, CHICAGO, ILLINOIS**

I, Park Jones, being first duly sworn on oath, do hereby depose and say:

1. I am employed as a Special Agent with the Internal Revenue Service, Criminal Investigation (IRS-CI) and have been so employed since September 2005. My responsibilities as a Special Agent include the investigation of potential criminal violations of the Internal Revenue Code under Title 26 of the United States Code as well as related Title 18 and Title 31 offenses. The facts set forth in this affidavit are based on my personal knowledge, documents and records I have reviewed in the course of this investigation, information I have gained through my law enforcement training and experience, and information I have obtained from others, all of whom I believe to be truthful and reliable. I have not included in this affidavit every detail I know about this investigation.

2. I submit this affidavit in support of a Verified Complaint for Civil Forfeiture *in rem* against certain real property commonly known as 4512 South Drexel Boulevard, Chicago, Illinois, with all improvements, appurtenances, and attachments thereon (hereinafter referred to as the “Drexel Property”).

3. Based on the facts and circumstances set forth below, I submit that the Drexel Property was purchased with proceeds constituting or traceable to proceeds of a wire fraud scheme that Francis Burns committed in violation of 18 U.S.C. § 1343. I further submit that the Drexel Property is therefore subject to civil forfeiture under 18 U.S.C. § 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1).

### **Record Owner of the 4512 South Drexel Boulevard, Chicago, Illinois**

4. According to the official records of the Register of Deeds in Cook County, Illinois, the defendant real property commonly known as 4512 South Drexel Boulevard, Chicago, Illinois, is titled in the name of World Burns, Inc., a corporation created and existed under the laws of the State of Wisconsin.

5. According to the Articles of Incorporation filed with the State of Wisconsin Department of Financial Institutions, Francis Burns is listed as a director for World Burns, Inc.

### **IRS Regulations**

6. An estate is the sum of an individual's assets, rights, entitlements, and interests to property of any kind. When an individual dies, their assets become property of their estate. The United States levies federal taxes on estates. There are potentially two kinds of taxes owed by an estate: one on the transfer of assets from the decedent to their beneficiaries and heirs (the estate tax), and another on income generated by assets of the decedent's estate (the income tax).

7. An income tax is levied when a decedent's estate income (examples include: interest earned on bank accounts, CDs, stocks, bonds, mutual funds and rental property) generates more than \$600 in annual gross income. The income and tax is reported on an IRS Form 1041, U.S. Income Tax Return for Estates and Trusts. The executor or personal representative of the estate must file the Form 1041. The Form 1041 can be filed electronically or by paper with the IRS.

8. The decedent and their estate are separate taxable entities. Therefore, the estate needs to obtain a tax identification number before filing a Form 1041.

9. A decedent's estate computes its gross income in the same manner as an individual. Most deductions and credits allowed to individuals are also allowed to estates and trusts.

10. Typically, the filing requirement for Form 1041 starts on the day of the estate owner's death and ends on Dec. 31 of the same year. The executor, however, can file an election to choose a fiscal year, which means the tax year ends on the last day of the month before the one year anniversary of death. The executor then has up to 12 months to file the income tax return.

11. Federal taxes are paid as the income is received rather than paying all the tax at the end of the year. This is referred to as the pay-as-you-go tax. The IRS has two methods for paying-as-you-go:

- Withholding – the tax is withheld from the income earned by an entity. This method is typically used by an employer to withhold income tax from an employee's pay. In addition, tax may be withheld from certain other income, such as pensions, bonuses, commissions, and gambling winnings. The amount of tax withheld is remitted to the IRS in the entity's name and taxpayer identification number.
- Estimated tax – this is a method used to pay tax on income that is not subject to federal withholding tax. This is used on income such as dividends, interest, capital gains, rents, and royalties.

12. The IRS has an electronic system ("e-file") for taxpayers to submit tax returns and other supporting documents to the IRS through an internet or direct connection. This is known as online filing. The preparation of an online return can be initiated from any personal computer with an internet connection. A taxpayer filing online must submit their return to the IRS via an authorized IRS e-file provider such as Intuit, Tax Act, or H&R Block Online. The provider will

act as a transmitter and send the formatted electronic tax return information directly to the IRS. The provider captures the Internet Protocol (IP) information such as the address, date, time, and time zone of the origination of a tax return filed online by a taxpayer. This information is transmitted with the taxpayer's electronic return to the IRS.

### **The Scheme to Defraud**

13. A tax refund fraud scheme involves one or more individuals who prepare and/or file false income tax returns on their own behalf using false income, deductions, or tax withholding amounts to generate a fraudulent claim for refund. A Form 1041 may be used to execute a tax refund scheme, just as a Form 1040 is often used to execute such a scheme. Using either type of return, a fraudster can manipulate the numbers on the form using false income, false tax withholding figures, or both to generate a fraudulent refund.

### **False 2015 Form 1041 that Francis Burns filed in the name of Estate of Francis Burns**

14. On or about September 29, 2016, the IRS electronically received a 2015 Form 1041 in the estate name of Francis Burns. The address on the return was 3421 West Vliet Street Ste [Suite] 80734, Milwaukee, Wisconsin 53208. According to United States Postal Service online records, the address of 3421 West Vliet Street, Milwaukee, Wisconsin, is a retail location of a United States Post Office. I obtained the Post Office Box Application for PO Box 80734 in Milwaukee, Wisconsin. The owner of PO Box 80734 listed on the application is World Burns Inc. c/o Francis Burns. Burns used his Wisconsin driver's license as an identification document to open the mailbox.

15. The Form 1041 has several sections at the beginning of the return that indicate what type of return is being filed – for example, a trust or estate tax return. In section A, the “Decedent's Estate” box was checked, which indicates that the tax return was being filed for an

estate. In addition, in sections D & F respectively, the “date entity created” question listed a date of “October 19, 1985” and the “initial return” box was checked. These entries on the tax return indicate that an estate was created on October 19, 1985, and that the initial estate tax return was being filed for 2015.

16. The 2015 Form 1041 in the estate name of Francis Burns reported no income or deductions.

17. In the tax and payments section, the return reported, on line 24e – “federal income tax withheld,” the sum of \$132,814. On the same line, there is a question asking “If any is from Form 1099, check [a box].” That box was checked, which indicates that all or a portion of the federal tax withheld would be substantiated by a corresponding Form 1099 filed by the withholder.

18. On November 8, 2016, based on the large amount of federal tax withholdings claimed to have been paid on the 2015 Form 1041 in the estate name of Francis Burns, the IRS issued a refund payment, via a check issued by the United States Treasury, of \$132,814.00 to the Francis Burns Estate.

19. However, that claim was false because the IRS has no record of payment of any tax withholdings for the Francis Burns estate.

20. On November 17, 2016, the tax refund check was deposited through an automated teller machine into a Wells Fargo Bank account, having the last four digits 1880. That account was titled “Burns Francis TTE Under DEC of TR 04/24/2016 TR.” The signor on the account was Francis Burns.

21. On or about December 1 and December 8, 2016, Burns conducted two overseas wire transfers of \$10,000 and \$55,580, respectively, to a bank account in Italy from Wells Fargo



1880. The beneficiary of the transfers was an individual having the initials M.B. residing in Treviso, Italy. M.B and Francis Burns had filed a married filing joint tax return in 2009.

**False 2016 Form 1041 that Francis Burns filed in the name of Estate of Francis Burns**

22. On February 3, 2017, the IRS electronically received a 2016 Form 1041 in the estate name of Francis Burns. The address on the return was 3421 West Vliet Street Ste [Suite] 80734, Milwaukee, Wisconsin 53208. The return was filed electronically online through TaxAct, Inc. TaxAct is an electronic transmitter based out of Cedar Rapids, Iowa. According to records obtained from TaxAct, Inc., the contact information on the 2016 Form 1041 was Francis Burns using a residential address of 3421 West Vliet Street, Milwaukee, Wisconsin, and an email address of FRANCESXXXXXXXXX@GMAIL.COM. I obtained the subscriber records from Google for the email address FRANCESXXXXXXXXX@GMAIL.COM. The subscriber name is Francesco Burns with a phone number of 414-XXX-5336. This is the same telephone number that Francis Burns has used to contact me during the investigation.

23. The online tax return originated from IP address ending in xx.xxx.xxx.238. An online geolocation search for IP address x.238 revealed the IP address originated in Pistoia, Italy.

24. Per travel records I obtained from United Airlines regarding Francis Burns, on December 28 and 29, 2016, Burns traveled from Chicago O'Hare International Airport to Frankfurt, Germany. Burns then took a connecting flight from Frankfurt, Germany, to Venice, Italy. Burns then returned from Venice, Italy, to Chicago, Illinois, on February 27, 2017. Therefore, Burns was in Italy on February 3, 2017, the date the 2016 Form 1041 was filed.

25. The 2016 Form 1041 in the estate name of Francis Burns reported total income of \$1,135,356. The income reported was \$961,860 of interest income and \$173,496 of other income. The income typically would be substantiated by one or more corresponding Forms 1099

filed by the payers of the supposed interest and income payments. The IRS has no record of any income reported for the Francis Burns estate. In the tax and payments section, the return had reported \$4,023,936 on line 24e – Federal income tax withheld. On the same line, there is a question asking “If any is from Form 1099, check [a box].” The box was checked, which indicates that all or a portion of the federal tax withheld would be substantiated by a corresponding Form 1099 filed by the withholder.

26. On March 7, 2017, based on the large amount of federal tax withholdings claimed to have been paid on the 2016 Form 1041 in the estate name of Francis Burns, the IRS issued a refund payment, via a check issued by the United States Treasury, of \$3,539,726.00 to the Francis Burns Estate.

27. However, that claim was false because the IRS has no record of payment of any tax withholdings for the Francis Burns estate.

28. On or about March 22, 2017, a bank account ending in 5849 was opened at Associated Bank (“Associated Bank 5849”). The signors on the account were listed as Burns Francis as Trustee and Francis Burns. It is unknown why Burns is listed a signor under the name “Burns Francis,” rather than Francis Burns. On the signature card, Burns listed his employer as World Burns, Inc.

29. On or about March 22, 2017, Burns deposited the 2016 tax refund check of \$3,539,726 into Associated Bank 5849 titled “Francis Burns As Trustee – Francis Burns Trust UTA 4/24/16.”

30. On or about March 8, 2018, I had a phone conversation with Francis Burns. Burns told me that he would be filing corrected estate tax returns.

31. On or about March 26, 2018, the IRS received a 2015 Form 1041 in the estate name of Francis Burns. The address on the return was 3421 West Vliet Street Ste [Suite] 80734, Milwaukee, Wisconsin 53208.

32. The return reported total income of \$133,694, which, as claimed on the return, was mostly interest income. The IRS has no record of any income reported for the Francis Burns estate. In the tax and payments section, the return had reported \$1,254,047 on line 24e – Federal income tax withheld. On the same line, there is a question asking “If any is from Form 1099, check [a box].” The box was checked, which indicates that all or a portion of the federal tax withheld would be substantiated by a corresponding Form 1099 filed by the withholder.

33. But this return is false because, as noted above, the IRS has no record of any withholdings for the Francis Burns estate

34. The return contained a document titled “Affidavit of Notice to Rescind Tax Filings For Year(s) 2015.” The document listed an Executor Office for Francis Burns at Nation Tuscany, Via Valdibrana No.275, Pistoia, Italy.

### **Purchase of the Defendant Drexel Property**

35. On or about May 26, 2017, Francis Burns signed an American Land Title Association Settlement statement to purchase the Drexel Property. The buyer listed on the settlement statement was World Burns, Inc. The settlement statement shows the final purchase price of the Drexel Property was \$750,000.00, and after adjustments/other charges, World Burns, Inc. paid \$757,725.00 for the Drexel Property.

36. On or about May 26, 2017, a wire transfer of \$757,725 from Associated Bank 5849 to Attorneys Title Guaranty Fund was completed to purchase the Drexel Property.

As mentioned above, Associate Bank 5849 had been opened approximately two months before the purchase of the Drexel Property.

37. From the date Associated Bank 5849 was opened until the Drexel Property was purchased with funds drawn on that account, the account was funded solely by two deposits. The first deposit was the tax refund check of \$3,539,726 from the fraudulent filing of the 2016 Form 1041, which occurred on March 22, 2017. The second deposit was for \$15,657.71, which occurred on March 24, 2017, and consisted of funds derived from an account closing at another financial institution. Therefore, at least 99.6% of the funds in Associated Bank 5849 used to purchase the Drexel Property are known proceeds from Francis Burns' fraudulent filing, using interstate wirings, of the false 2016 Form 1041 tax return on behalf of the Francis Burns Estate.

38. On or about June 5, 2017, a Special Warranty Deed for the Drexel Property was filed with the Cook County Illinois Recorder of Deeds Office. The deed transferred ownership of the Drexel Property to World Burns, Inc.

### **Conclusion**

39. Thus, the \$757,725.00 in funds used to buy the Drexel Property were derived from wire fraud, namely, Francis Burns' fraudulent electronic filing of the false 2016 Form 1041 on behalf of the Francis Burns Estate.

40. Based on my training and experience, and the above-described evidence I have received and the information I have obtained in the course of this investigation to date, I submit there exists probable cause to believe that the defendant real property commonly known as 4512 South Drexel Boulevard, Chicago, Illinois, was purchased with proceeds constituting or traceable to proceeds of a wire fraud scheme, committed in violation of 18 U.S.C. § 1343, and is

therefore subject to civil forfeiture to the United States of America under 18 U.S.C.

§§ 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1).

PARK JONES

Park Jones

Subscribed and sworn to before me  
this 15<sup>th</sup> day of August, 2018.

s/CATHY L. TRAUTMAN

Notary Public, State of Wisconsin

My commission: expires 08/30/19.

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box: ☐ Green Bay Division ☒ Milwaukee Division

## I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Scott J. Campbell, AUSA

US Attorney's Office, #530 Federal Building

517 E. Wisconsin Avenue, Milwaukee, WI 53202 (414-297-1700)

## DEFENDANTS

Certain Real Property commonly known as 4512 South Drexel Boulevard, Chicago, Illinois

County of Residence of First Listed Defendant Cook County, Illinois

(IN U.S. PLAINTIFF CASES ONLY)

NOTE:

IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

☒ 1 U.S. Government Plaintiff

☐ 3 Federal Question (U.S. Government Not a Party)

☐ 2 U.S. Government Defendant

☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES

(Place an "X" in One Box for Plaintiff and One Box for Defendant)

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

## IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIW W (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN

(Place an "X" in One Box Only)

☒ 1 Original Proceeding

☐ 2 Removed from State Court

☐ 3 Remanded from Appellate Court

☐ 4 Reinstated or Reopened

☐ 5 Transferred from another district (specify)

☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
18 USC § 981(a)(1)(C)

Brief description of cause:

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes

☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

08/21/2018

s/SCOTT J. CAMPBELL

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

Case 2:18-cv-01290 Filed 08/21/18 Page 1 of 1 Document 1-2

APPLYING

JUDGE

MAJ. JUDGE